



**EDISON ELECTRIC
INSTITUTE**

December 28, 2009

Mr. Hampton Newsome
Division of Enforcement
Bureau of Consumer Protection
U.S. Federal Trade Commission
Room NJ-2122
600 Pennsylvania Avenue NW
Washington, DC 20580

Re: Proposed Lamp Labeling Amendments, P084206

Dear Mr. Newsome:

This letter is written in response to the Federal Register notice of November 10, 2009 on updating the energy labeling requirements for lamps.

EEI is the association of the United States investor-owned electric utilities, combination gas & electric utilities, industry affiliates, and associates worldwide. Its U.S. members serve 97 percent of all customers served by the investor-owned segment of the industry. They generate approximately 60 percent of all the electricity generated by electric utilities in the country and service 71 percent of all ultimate customers in the nation.

EEI supports the use of energy efficiency labeling which gives consumers clear, easily understandable information about the energy use, and potential costs, of the products they are considering for purchase.

EEI supports the use of a "Lighting Facts" label similar to nutrition labels and the side label with brightness and estimated annual energy cost information. EEI believes that the proposed two panel labeling format will help consumers when they are purchasing lighting products.

EEI also supports regulations that are market and fuel neutral. In this regard, EEI suggests that the FTC also require similar labels to be placed on fossil-fueled lighting systems, such as natural gas lights, propane lights, kerosene lights, etc. The information that is provided for electric lights can also be provided for non-electric

lights (brightness, estimated annual energy cost, life in years, color appearance, etc) and will also help consumers in their purchasing decisions.

For the energy usage portion of the label for fossil-fueled lamps, EEI suggests showing the units used in terms that consumers should understand (such as 2500 Btu/hr or 0.025 therms/hr for natural-gas fired lamps), and converting them to "equivalent Watts". For example, 2500 Btu/hr would be converted, using the conversion formula of 3.413 Btu/hr per Watt to 732.5 "equivalent Watts".

In addition, since many gas lights have continuously burning pilot light systems that operate 24 hours per day, 365 days per year, the "Estimated Yearly Energy Cost" would need to be modified to say "based on 3 hrs/day and continuously burning pilot light and average cost of \$1.20 per therm" (or the latest DOE national average cost for the fossil fuel. In the example with the gas light using 2500 Btu/hr on a continuous basis, the annual average usage would be 219 therms, and the estimated yearly energy cost would be \$262.80 (at an estimated natural gas cost of \$1.20 per therm).

Thank you for your review of our letter. Please let us know if you have any questions or comments.

Sincerely,

Steven Rosenstock, P.E.
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